To Whom It May Concern:

My name is Lew Paceley. I am a graduate electrical engineer and amateur radio operator, N5ZE.

Recent measurements of active BPL sites by the ARRL and private parties have shown devastating levels of RF emission in the areas where BPL trials are deployed. I don't use the term devastating lightly. BPL interference emission levels, even within existing Part 15 standards have been shown capable of obstructing HF communication in the areas surrounding the deployed BPL sites.

This will affect not only amateur radio operators in those areas but emergency services, military radio services, radio astronomy, and law enforcement. Even consumers who have purchased shortwave radios will find them useless near BPL enabled power lines.

It is unthinkable that the FCC would even consider allowing licensed HF services to be disrupted by a technology who existence is completely redundant in light of the available DSL, Cable, Satellite, and Community RF broadband services.

However, my greatest fear based on the reports provided by the ARRL and private parties is that we are unleashing a global pollution like no other ever experienced. Communication on the HF bands routinely occurs over thousands of miles with mere milliwatts of power.
As each BPL system comes on line this radio frequency pollution will additively combine until the noise floors in the HF frequencies will be so high that HF bands will be all but useless in times of favorable propagation. HF operation is the backbone of amateur radio communications because no infrastructure other than the equipment on each side of the transmission is required. We have frequency allocations that allow intra-state, national, and international communications. The amateur radio infrastructure is completely self-funded and is available to the country at no cost any time there is an emergency. As a rule, amateur radio equipment is far more modern (because amateurs pay for it, not tax dollars) than most Civil Defense equipment. If the HF bands become polluted by BPL, there will be little effective amateur radio infrastructure left. I challenge you to speak to a number of amateur operators and ask them if they will remain active if their available frequencies are covered in RF noise due to BPL system emissions.

Finally, I need to express my disappointment. As the HF frequencies are a shared resource, I am surprised at the number of people who are not aware of the level of RF pollution that BPL systems emit. It gives the impression that while comments are being solicited, that the ultimate impact to the RF environment has not been contemplated or is being ignored. The HF radio environment can be extremely efficient at propagating very low power level signals. Make no mistake, in its current form BPL will be a global pollution phenomena. I strongly recommend that the FCC take its executives to a site where BPL is being deployed and let an amateur radio operator with contemporary

equipment demonstrate the devastating effect of BPL operation on HF communication.

BPL is an intentional radiator, operating 24 hours a day, 7 days a week. As such, it needs to become a licensed service with a defined frequency band to ensure that other services are not being interfered with. To allow industry to use Part 15 for something which knowly radiates signals which can be detected over thousands of miles cannot be allowed and is stretching Part 15 substantially beyond it's original intent and purpose. Please do not allow this loophole to destroy such a valuable shared resource. Thank you.